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September 16, 2024
Hon. Justice Pamela K. Chen
United States District Court
Eastern District of New York
Courtroom: 4F
225 Cadman Plaza East
Brooklyn New York 11201

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Honorable Justice Chen:

This office represents Eugene Liddie, a non-party in the above-referenced action.

The order of the Court on July 30, 2024 indicated that the Court wanted to hear “directly from Jeremy Koenig of Giant Partners” and that the Plaintiff was to arrange “approximately two hours on a day and time for Mr. Mr. Koenig to testify remotely.”

This office only carved out approximately “two hours” on September 25, 2024 to engage in a possible examination of Mr. Koenig remotely. The Court did not require that such an appearance be in person.

The undersigned is not in a position to appear on the 25th with Mr. Liddie in person. In fact, in light of the Court’s order, Mr. Liddie was advised that his appearance did not seem to be required and that he could join the remote link, if he so chose. We object to appearing in person on September 25, 2024.

Second, my office has not received any new documents related to a Subin production and

we are also in need of copies of the exhibits from the May 29, 2024 and July 29, 2024 hearings, as my office was not given a binder of said exhibits.

We respectfully request that the Court first determine if such additional testimony is necessary and if so, that a separate date for additional in-person testimony from Mr. Liddie be scheduled; and that any materials that will be the subject of any additional testimony be turned over in advance.

Respectfully Submitted,

/s/
Karen H. Charrington, Esq.

cc:

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